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May 19, 2004

Docket Management System, Doc No. FAA-2004-17459—\
U.S. Department of Transportation
Room Plaza 401, 400 Seventh Street, SW.
Washington, DC 20590-0001

OF TRAMSPOSTATION

Re: Docket number FAA-2004-17459, Mt. Rushmore National Memorial Air Tour Management Plan Scoping

Hello,

Thank you for the opportunity to submit comments as part of the scooping process for development of the Mount Rushmore National Memorial Air Tour Management Plans.

While the Mt. Rushmore ATMP is being developed in consort with the Badlands NP ATMP, the two are and should be very distinct. Mount Rushmore is primarily a manmade visual icon, and as such is not a high priority for quiet-use recreation. Many Americans, especially those who are aged or otherwise likely to enjoy air tours, will appreciate the opportunity to see the monument from the dramatic perspective of the air. Therefore, it makes sense to offer a generous supply of air tours to view the monument. However, it is also important to provide some consistent opportunities for quiet reflection, so I encourage the ATMP to provide for at least one day a week to be flight-free, and to keep the time around sunrise and sunset free of flights on all or most days.

Further, Mt. Rushmore flights should not necessarily be extended deep into the Black Hills or Badlands National Park. These areas include many opportunities for quiet recreation, as well as containing many sites sacred to local native populations. Air tours in the Black Hills and the Badlands must be very limited.

The Mt. Rushmore ATMP offers a great opportunity to develop a range of alternatives that is centered on providing ample opportunities for air tours, while maintaining clear and absolute windows for quiet experiences of the Memorial. The resultant ATMP could become a model for other national park units where quiet use is not primary.

In order to minimize conflict with advocates for quiet in the Black Hills and Badlands, most alternatives should be aimed at air tour corridors that avoid or only minimally impact these nearby areas. Any flight paths into or adjacent to the Badlands or Black Hills should be on the downwind side of the affected area, so that aircraft sound moves away from, rather than into, the quiet zones.

At least one alternative should include strict flight-free periods; ideally a full day or two and minimally several periods weekly around dusk.

I look forward to being kept abreast of the development of this and other ATMPs.

Sincerely,

Jim Cummings, Executive Director, Acoustic Ecology Institute

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